

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**Caption in Compliance with D.N.J. LBR 9004-1(b)**
*[Enter your name, address and telephone number]*Peter Cecinini, Esq.
1081 Avenue C
Bayonne, NJ 07002
Attorney for Creditor Landlord
Stefan Tsvetkov
201-354-9305**In Re:**
[Enter the debtor's name(s)]

Ruth I. Baez

Case No.: 23-16865-VFP
[Enter the case number]
Chapter: 7
[Enter the chapter; example: 13]
Hearing Date: 10/24/2023
[Enter the hearing date]
Judge: Vincent F. Papalia
*[Enter the Judge's last name]***NOTICE OF MOTION
FOR RELIEF FROM THE AUTOMATIC STAY***[Enter your name]* Stefan Tsvetkov, the debtor's landlord, has filed papers with the court requesting relief from the automatic stay in order to initiate or resume an action in the state court of New Jersey for possession of the premises rented by the debtor(s) located at:4523 Harrison Pl., 2nd Floor, Union City, NJ 07087**YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).**

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: October 24, 2023
[Enter the date of the hearing]
Hearing Time: 10 AM
[Enter the time of the hearing]
Hearing Location: 50 Walnut Street
[Enter the location of the hearing]
Newark, NJ 07102

Courtroom Number: Courtroom 3B
[Enter the courtroom number]

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to:

[Enter the trustee's name and address]

[Enter the name and address of all other parties who will be affected by this motion]

David Wolf, Esq. (Ch. 7 Trustee)
396 Route 34
Matawan, NJ 07747

Jeffrey H. Ward, Esq. (Attorney for Debtor)
2 Village Ct.,
Hazlet NJ 07730

Ruth I. Baez (Debtor)
4523 Harrison Pl., 2nd Floor
Union City, NJ 07087

Peter Ceceinini, Esq.
1081 Avenue C
Bayonne, NJ 07002

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: 9/19/2023
[Enter the date this document is signed]

/s/ Peter Cecinini, Esq.
Signature *[Of the party seeking relief]*

Caption in Compliance with D.N.J. LBR 9004-1(b)
[Enter your name, address and telephone number]

Peter Cecinini, Esq.
1081 Avenue C
Bayonne, NJ 07002
Attorney for Creditor Landlord
Stefan Tsvetkov
201-354-9305

In Re:
[Enter the debtor's name(s)]

Ruth I. Baez

Case No.: 23-16865-VFP
[Enter the case number]
Chapter: 7
[Enter the chapter]
Hearing Date: 10/24/2023
[Enter the hearing date]
Judge: Vincent F. Papalia
[Enter the judge's last name]

**CERTIFICATION OF LANDLORD IN SUPPORT
OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, *[Enter the name of the person that has personal knowledge of the facts set forth below]*

Stefan Tsvetkov, landlord in the above captioned case, submits this

Certification in support of the Motion for Relief from the Automatic Stay filed on *[Enter the date the motion was filed. 9/21/23]*

1. I am fully familiar with the debtor's rental payment history because I am the landlord of the property rented by the debtor.

2. The property is located at: *[Enter the address of the property]* 4523 Harrison Pl, 2nd Floor, Union City, NJ 07087.

3. The debtor filed for bankruptcy on *[Enter the date the debtor filed their petition]* 08/09/2023.

4. Pre-petition *[check one]*:

☒ I started an eviction action in the New Jersey state court and a copy of the complaint is attached as Exhibit A, or

☐ I did not start an eviction action.

5. Pre-petition *[check one]*:

☒ I obtained a Judgment for Possession and a copy of the Judgment is attached as Exhibit B, or

I did not obtain a Judgment for Possession

6. I am seeking relief from the automatic stay to *[check all that apply]*:

☒ enforce the Judgment of Possession;

☒ pursue my state court rights because of the debtor's nonpayment of rent;

☐ pursue my state court rights because of debtor's endangerment of the property in the 30 days before the petition date *[explain below]*

☐ pursue my state court rights because the debtor illegally used, or allowed to be used, controlled substances on the property in the thirty (30) days before the petition date *[explain below]*

☒ other *[explain]* Upon information and belief, a Judgment of Possession by default was entered against the debtor on or about Augst 30, 2023 under the pending docket number HUD-LT-1812-23, however

the judgment of possession had yet to be uploaded by the court. Prior to the trial date this office filed an adjournment request based on the automatic stay, which was denied. A true and accurate copy of the adjournment request as filed is attached hereto as **Exhibit B**.

7. The amount of the debtor's monthly rental payment is \$ 2,350.00.

8. Pre-petition, the debtor owed rent totaling \$ 21,150.00, which represents unpaid rent for 9 months.

9. The debtor's post-petition payment history is as follows *[Enter requested information for each payment due]*:

| | Amount Due | Payment Due Date | Date Payment Received | Amount Received | How Payment Was Applied |
|----|------------|------------------|-----------------------|-----------------|-------------------------|
| 1 | \$2,235.00 | 8/1/2023 | N/A | \$0 | |
| 2 | \$2,350.00 | 9/1/2023 | N/A | \$0 | |
| 3 | | | | | |
| 4 | | | | | |
| 5 | | | | | |
| 6 | | | | | |
| 7 | | | | | |
| 8 | | | | | |
| 9 | | | | | |
| 10 | | | | | |
| 11 | | | | | |
| 12 | | | | | |

10. Post-petition, the debtor owes rent totaling \$4,700.00, which represents unpaid rent for 2 months, plus late charges totaling \$ 100.00.

11. The debtor's failure to pay rent is cause for relief from the automatic stay.

12. Through this motion, I request relief from the automatic stay so I may initiate or continue an action in the state court to remove debtor from the rented premises.

I certify under penalty of perjury that the above is true.

Date: 9/21/23

[Enter the date this document is signed]

/s/ Stefan Tsvetkov

Signature of Landlord

EXHIBIT A

Landlord Verification

1. I certify that I am the **X** Landlord, General Partner of the partnership, or authorized officer of a corporation or limited liability company that owns the premises in which tenant(s) reside(s).
2. I have read the verified complaint and the information contained in it is true and based on my personal knowledge.
3. The matter in controversy is not the subject of any other court action or arbitration proceeding now pending or contemplated and no other parties should be joined in this action except (list exceptions or indicate none): None
4. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b).
5. The foregoing statements made by me are true and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

At the trial plaintiff will require:

An interpreter? No Indicate language
An accommodation for a disability? No Required accommodation

Dated: 3/10/2023

/S/ Stefan Tsvetkov

(Signature of Landlord, Partner or Officer)

Stefan Tsvetkov

(Printed Name of Landlord, Partner or Officer)

James Begliomini, Esq. 389002021
Cecinini Law Group LLC
1081 Avenue C
Bayonne, NJ 07002
(201) 354-9305, James@cecininilaw.com
Attorney for Landlord Stefan Tsvetkov

Stefan Tsvetkov,

Plaintiff/Landlord,

v.

Ruth Ivette Baez,

Defendant(s).

SUPERIOR COURT OF NEW JERSEY

Law Division, Special Civil Part

Hudson County

Docket No.: LT - _____

Civil Action

Verified Complaint
Landlord/Tenant

☒ Non-payment of Rent

☐ Other (Required Notices Attached)

☐ Commercial

☒ Residential

Address of rental premises: 4523 Harrison Place, Apt 2, Union City, NJ 07087.

1. The owner of record is (name of owner) Stefan Tsvetkov.
2. Plaintiff is the owner or (check one) ☐ agent, ☐ assignee, ☐ grantee or ☐ prime tenant of the owner.
3. The landlord ☐ did ☒ did not acquire ownership of the property from the tenant(s).
4. The landlord ☐ has ☒ has not given the tenant(s) an option to purchase the property.
5. The tenant(s) now reside(s) in and has (have) been in possession of these premises since (date) 9/1/22 under Written agreement.
6. ☐ Check here if the tenancy is subsidized pursuant to either a federal or state program or the rental unit is public housing.
7. The landlord has registered the leasehold and notified tenant as required by N.J.S.A. 46:8-27.
8. The amount that must be paid by the tenant(s) for these premises is 2,350.00, payable on the 1st

day of each X month or ____ week in advance.

COMPLETE PARAGRAPHS 9A, 9B AND 6C IF COMPLAINT IS FOR NON-PAYMENT OF RENT

9A. There is due, unpaid and owing from tenant(s) to landlord(s) rent as follows:

\$2350 base rent for Oct 2022

\$2350 base rent for Nov 2022

\$2350 base rent for Dec 2022

\$2350 base rent for Feb 2023

\$2350 base rent for March 2023

\$50.00 late charge for Oct 2022

\$50.00 late charge for Nov 2022

\$50.00 late charge for Dec 2022

\$50.00 late charge for Feb 2023

\$50.00 late charge for March 2023

\$850.00 attorney fees*

\$57.00 Court costs (filing fees)

\$ other* (specify)

\$ **12,907.00** TOTAL due as of the date of this Complaint.

* The late charges, attorney fees and other charges are permitted to be charged as rent for purposes of this action by federal, state and local law (including rent control and rent leveling) and by the lease.

9B. The date that the next rent is due (date) March 1, 2023

If this case is scheduled for trial before March 1, 2023, the total amount you must pay to have this complaint dismissed is (Total from line 9A) \$12,907.00.

If this case is scheduled for trial on or after March 1, 2023 but before April 1, 2023, the total amount you must pay to have this complaint dismissed is (Total from line 9A plus the amount of the next rent due) \$15,257.00.

If this case is scheduled for trial on or after April 1, 2023, the total amount you must pay to have this complaint dismissed is (Total from line 9A plus the amount of the next two rents due) \$17,607.00. This is a continuing demand and each month's rent which becomes due after April 1, 2023, but prior to the date trial is scheduled in this case, are further demanded by Plaintiff.

These amounts do not include late fees or attorney fees for section 8 and public housing tenants. Payment may be made to the landlord or the clerk of the court at any time before the trial date, but on the trial date payment must be made by 4:30 p.m. to get the case dismissed.

Check Paragraphs 10 and 11 if the Complaint is for other than, or in addition to, Non-Payment of Rent.
Attach All Notices to Cease and Notices to Quit/Demands For Possession.

10. _____ Landlord seeks a judgment for possession for the additional or alternative reason(s)
stated in the notices attached to this complaint. STATE REASONS:

(Attach additional sheets if necessary)

11. X The tenants(s) has (have) not surrendered of the premises and tenants(s) hold(s) over and
continue(s) in possession without the consent of landlord.

WHEREFORE, plaintiff/landlord demands judgment for possession against the tenant(s) listed above,
together with costs.

Dated: 3/10/2023

/S/ James Begliomini

James Begliomini, Esq.

Attorney for Landlord Stefan Tsvetkov

Tenancy Summons and Return of Service (R. 6:2-1)



NOTICE: This is a public document, which means the document as submitted will be available to the public upon request. Therefore, do not enter personal identifiers on it, such as Social Security number, driver's license number, vehicle plate number, insurance policy number, active financial account number, active credit card number or military status.

Plaintiff or Filing Attorney Information:

Name: JAMES A BEGLIOMINI

NJ Attorney ID Number: 389002021

Address: 1081 AVENUE C

BAYONNE, NJ 07002-0000

Telephone: 201-354-9305

Superior Court of New Jersey

Law Division, Special Civil Part

HUDSON County

HUDSON County Courthouse

595 NEWARK AVENUE, ROOM 104

JERSEY CITY, NJ 07306-0000

Stefan Tsvetkov

Plaintiff(s)

Docket Number: HUD-LT-001812-23

(to be provided by the court)

versus

Ruth I Baez

Defendant (s)

Civil Action

SUMMONS

LANDLORD/TENANT

Defendant Information:

Name: Ruth I Baez

Address: 4523 Harrison Place, Apt 2

Union City, NJ 07087-0000

Phone: 2013623324

NOTICE TO TENANT: The purpose of the attached complaint is to permanently remove you and your belongings from the premises. You will be notified when a court proceeding is scheduled. Please contact the Office of the Special Civil Part at 201-748-4400 ext.60028 regarding your case. Please go to njcourts.gov for general information on landlord/tenant actions.

If you cannot afford to pay for a lawyer, contact Legal Services at 201-792-6363 to see if you qualify for free legal advice. If you can afford to pay a lawyer but do not know one, you may call the Lawyer Referral Services of your local county Bar Association at 201-798-2727

You might be eligible for housing assistance. To determine your eligibility, you must immediately contact the welfare agency in your county at 257 CORNELISON AVENUE, JERSEY CITY, NJ, 07302-0000, telephone number 201-420-3000. If you need an interpreter or an accommodation for a disability, you must notify the court immediately.

NOTIFICACIÓN AL (A LA) INQUILINO(A) El objetivo de la denuncia adjunta es desalojarle a usted y sacar sus pertenencias permanentemente del sitio alquilado. Se le notificará la fecha cuando se haya programado el procedimiento judicial. Sírvase comunicarse sobre su caso con la Oficina de la Parte Civil Especial llamando al 201-748-4400 ext.60028. Para obtener información general sobre las acciones de propietarios/inquilinos, vaya a njcourts.gov.

Si no puede pagar los servicios de un abogado, póngase en contacto con la oficina de Servicios Legales llamando al 201-792-6363 para averiguar si reúne las condiciones para recibir asesoramiento legal gratis. Si puede pagarle a un abogado, pero no conoce a ninguno, llame al Servicio de Referencia de Abogados del Colegio de Abogados local de su condado llamando al 201-798-2727.

Es posible que reúna los requisitos para recibir ayuda con la vivienda. Para que se haga esa determinación, tiene que ponerse en contacto inmediatamente con la agencia de bienestar social de su condado en 257 CORNELISON AVENUE, JERSEY CITY, NJ, 07302-0000, número de teléfono 201-420-3000. Si necesita un intérprete o un arreglo especial por una discapacidad, tiene que notificárselo al tribunal de inmediato. acomodación para un impedimento físico, tiene que notificárselo inmediatamente al tribunal.

Date: 03/10/2023

/s/ Michelle M. Smith
CLERK OF THE SUPERIOR COURT

Court Officer's Return of Service (For Court Use Only)

Docket Number: _____ Date _____ Time _____

WM _____ WF _____ BM _____ Other _____ Ht _____ Wt _____ Age _____ Mustache _____ Beard _____ Glasses _____

Name: _____ Relationship _____

Efforts Made to Personally Serve _____

Description of Premises if Posted _____

I hereby certify the above to be true and accurate: _____
Special Civil Part Officer

Docket Number: LT- _____

Landlord Case Information Statement

Case Details: HUDSON - Special Civil Part Docket# HUD-LT-001812-23

Caption: Tsvetkov VS Baez Ruth

Plaintiff/Landlord

Name of Plaintiff/Landlord: Stefan Tsvetkov

Email Address: stefan.tsvetkov@yahoo.com

Home/Office Phone: 9173783154

Cell Phone:

Attorney Name and Firm: JAMES A BEGLIOMINI , CECININI
LAW GROUP LLC

Email Address: JAMES@CECININILAW.COM

Office Phone: 201-354-9305

Cell Phone:

Attorney/Plaintiff Mailing Address: 1081 AVENUE C
BAYONNE NJ 07002

Defendant/Tenant

Name of Defendant/Tenant(s): Ruth I Baez

Rental Property Address: 4523 Harrison Place, Apt 2 Union
City NJ 07087

Municipal Code: 0910

Email Address:

Home/Office Phone: 2013623324

Cell Phone:

Type of Tenancy: ☒ Residential ☐ Commercial

Cause of Action: ☒ Non-Payment
☐ Other (Holdover for Cause)

Holdover Cause of Action:

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

☐ Subsidized Housing

Type: ☐ Public Housing ☐ Section 8 Voucher ☐ Section 8 HAP Contract ☐ Other Subsidy Program

☐ Notice(s) that are required for Holdover, Public Housing and/or Subsidized Housing are attached to the complaint.

☐ Rental property is not a covered property under the Federal CARES Act, 15 U.S.C. § 9057(f) or 9058(a).

☐ The tenancy is subject to a municipal rent control ordinance.

The total number of months of unpaid rent is: 05

The first month of unpaid rent was: October 2022

The amount due and owing by the tenant in this case is: \$ 12907.00

I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

I certify that the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 03/10/2023

Attorney/Plaintiff Signature: /S/ JAMES A BEGLIOMINI



Landlord Civil Case Information Statement (LCIS)

Holdover Causes of Action

Residential Tenancy

| | | |
|----|---|----------------------------------|
| 1 | Disorderly Tenant | N.J.S.A. 2A:18-61.1(b) |
| 2 | Willful or Gross Negligent Damage to Premises | N.J.S.A. 2A:18-61.1(c) |
| 3 | Violation of Rules and Regulations | N.J.S.A. 2A:18-61.1(d) |
| 4 | Violation of the Lease Covenants | N.J.S.A. 2A:18-61.1(e) |
| 5 | Violation of the Lease Covenants Under the Control of a Public Housing Authority or Redevelopment Agency | N.J.S.A. 2A:18-61.1(e) |
| 6 | Failure to Pay Rent After Increase | N.J.S.A. 2A:18-61.1(f) |
| 7 | Demolish/Board Up Premises | N.J.S.A. 2A:18-61.1(g) |
| 8 | Permanently Retiring Residential Building/Mobile Home Park from Residential Use | N.J.S.A. 2A:18-61.1(h) |
| 9 | Reasonable Changes to Lease at End of Lease Term that Tenant Refuses to Accept | N.J.S.A. 2A:18-61.1(i) |
| 10 | Habitual Late Payment of Rent | N.J.S.A. 2A:18-61.1(j) |
| 11 | Converting Property to Condominium or Cooperative Ownership | N.J.S.A. 2A:18-61.1(k) |
| 12 | Personal Occupancy by Owner or Purchaser of Unit (property converted to condo/cooperative or fee simple ownership) | N.J.S.A. 2A:18-61.1(l)(1) |
| 13 | Personal Occupancy by Owner or Purchaser of Unit (owner of a building with 3 or fewer condo/cooperative units. | N.J.S.A. 2A:18-61.1(l)(2) |
| 14 | Personal Occupancy by Owner or Purchaser of Unit (building with 3 or fewer residential units) | N.J.S.A. 2A:18-61.1(l)(3) |
| 15 | Rental is Conditioned on Tenant's Employment by Landlord | N.J.S.A. 2A:18-61.1(m) |
| 16 | Convicted or Pleaded Guilty to Offenses under the 1987 Comprehensive Drug Reform Act, or Harbors such Person | N.J.S.A. 2A:18-61.1(n) |
| 17 | Convicted or Pleaded Guilty to Assault/Threats against Landlord, Landlord's Family or Employee, or Harbors such Person | N.J.S.A. 2A:18-61.1(o) |
| 18 | Tenant or Tenant Harbors such Person previously found Liable in a Civil Action for Certain Criminal Acts on the Rental Premises | N.J.S.A. 2A:18-61.1(p) |
| 19 | Tenant or Tenant Harbors Such Person who pleaded or was convicted of theft of property from the Landlord, the Rental Premises, or Other Tenants | N.J.S.A. 2A:18-61.1(q) |
| 20 | Tenant or Tenant Harbors such Person previously found Liable in a Civil Action for Human Trafficking on the Rental Premises | N.J.S.A. 2A:18-61.1(r) |
| 21 | Residents at Residential Health Care Facilities (non-payment or holdover) | N.J.S.A. 30:11A-1 <i>et seq.</i> |

Commercial Tenancy; Owner-Occupied Premises with Two or Less Residential Units; Rental Unit Held in Trust on behalf of Immediate Family Member Who Permanently Occupies the Unit not Developmentally Disabled

| | | |
|----|--|-------------------|
| 22 | Tenant Stays after Expiration of Lease Term | N.J.S.A. 2A:18-53 |
| 23 | Tenant Disorderly as to Destroy Peace and Quiet | N.J.S.A. 2A:18-53 |
| 24 | Tenant Willfully Destroys, Damages or Injures the Premises | N.J.S.A. 2A:18-53 |
| 25 | Tenant Constantly Violates Landlord's Written Rules and Regulations | N.J.S.A. 2A:18-53 |
| 26 | Tenant Breaches/Violates any Agreement in Lease that Provides for Right of Reentry | N.J.S.A. 2A:18-53 |
| 27 | Violation of Alcoholic Beverages Laws by Commercial Tenant | N.J.S.A. 33:1-54 |

EXHIBIT B

CECININI LAW GROUP LLC

1081 AVENUE C
BAYONNE, NJ 07002

201-354-9305 Phone
201-603-6615 Fax
James@cecininilaw.com

August 28, 2023

PETER CECININI, ESQ.
LAUREN ROSS, ESQ.
JAMES BEGLIOMINI, ESQ.

Via e-Courts

Hon. Kalimah H. Ahmad, J.S.C.
Superior Court of New Jersey
595 Newark Avenue, 2nd Floor
Jersey City, NJ 07306

RE: Tsvetkov v. Baez

Docket No.: HUD-LT-1812-23

Adjournment Request

Dear Judge Ahmad,

As you are aware this office represents the Plaintiff in the above referenced matter presently scheduled for trial on August 30, 2023 at 8:30am.

Kindly adjourn this matter as the tenant has supplied proof of a pending rental assistance application. As per the Notice to the Bar issued by the Court on August 5, 2021, "if the requesting party does provide documentation of their pending application for rental assistance, the judge shall adjourn the mandatory settlement conference or trial date to allow for the resolution of the rental assistance application...". A true and accurate copy of the August 5, 2021 Notice to the Bar issued by the Court is attached hereto as **Exhibit A**.

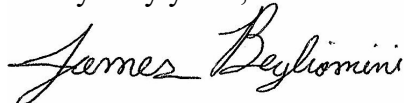
The tenant has submitted proof that she has been approved for \$4,800.00 in assistance through the NJDCA EPP under application ID: NJE256371. A true and accurate copy of the approval for this assistance is attached hereto as **Exhibit B**. Unfortunately, the \$4,800.00 EPP check that was lost in transit and never received by the Plaintiff. The tenant has submitted a request with the rental assistance agency to reissue this check. A true and accurate copy of the tenant's request for the rental assistance agency to reissue the lost check is attached hereto as **Exhibit C**. Additionally, the tenant has provided proof that on August 11, 2023 she was approved for \$18,000.00 in rental assistance through the Hudson County Emergency Rental Assistance Program. A true and accurate copy of the approval provided by the tenant is attached hereto as **Exhibit D**. Per the approval e-mail from the Hudson County Emergency Rental Assistance Program, payment to the landlord will be issued in approximately 25 business days from the date of approval.

In addition to the above, my office was notified that the tenant filed a petition for bankruptcy on August 9, 2023 which operates as an automatic stay of all legal actions taken against the debtor. A true and accurate copy of the Notice of Bankruptcy provided by the tenant

is attached hereto as **Exhibit E**. Plaintiff intends to file a motion in bankruptcy court requesting relief from the automatic stay in the event payment from the above referenced rental assistance agencies fails to bring the tenant current on all rents due and owing.

In light of the above, it is respectfully requested that the trial scheduled for August 30, 2023, be adjourned for a period of 30 days. Please do not hesitate to contact my office with any questions or concerns.

Very truly yours,

A handwritten signature in cursive script that reads "James Begliomini".

James Begliomini, Esq.

Exhibit A

NOTICE TO THE BAR

LANDLORD TENANT – PROTOCOLS FOR CASES IN WHICH AN APPLICATION FOR RENTAL ASSISTANCE IS PENDING; ONGOING COMMUNITY OUTREACH EFFORTS

This notice provides information about the Judiciary's adjournment protocol for those residential landlord tenant cases in which an application for rental assistance is pending. It also provides information about the Judiciary's ongoing efforts to connect landlords and tenants with available rental assistance resources.

Requests to Adjourn Court Proceedings in Residential Landlord Tenant Cases Pending Resolution of Rental Assistance Application

The following protocol applies to all court proceedings, including mandatory settlement conferences and trials, in residential landlord tenant cases for non-payment, habitual late payment, or failure to pay a rent increase. Either party (tenant or landlord) may request adjournment of a scheduled court date if an application for rental assistance is pending. These protocols remain subject to refinement based on any future developments.


- The party requesting the adjournment must provide documentation that an application for rental assistance has been submitted and the status of that pending application, if known.
- Consistent with existing authority and current practice, a short adjournment will be granted to provide time to obtain and submit that documentation.
- If the requesting party does provide documentation of their pending application for rental assistance, the judge shall adjourn the mandatory settlement conference or trial date to allow for resolution of the rental assistance application for a period of 60 days or when the application is resolved, if earlier.
- The judge may expand the 60-day adjournment period if the parties agree or if the judge determines that exceptional circumstances exist.

Ongoing Efforts to Support Resolution of Landlord Tenant Cases Without Trial

Receipt of rental assistance benefits both tenants and landlords. Resolution of prospective or pending landlord tenant cases through the distribution of available rental assistance funds also supports the Judiciary in its ongoing efforts to provide a fair, efficient, and neutral forum for the adjudication of disputes. Accordingly, the Judiciary is continuing to work to connect tenants and landlords with rental assistance resources so that potential and pending disputes can be resolved without trial. As one step in those efforts, the Judiciary is hosting an informational webinar on landlord tenant legal information and community resources on Thursday, August 5, 2021, from 4:00 p.m. to 5:30 p.m. Additional details are available on the Judiciary's [website](#). A recording of that webinar will be posted. Vicinages will be conducting additional information outreach events in the coming weeks.

The Judiciary's website also has [information](#) about what rental assistance and legal assistance resources are available in each of the counties. This information is also distributed to parties in pending cases in writing and again conveyed by staff at settlement conferences. The Judiciary is continuing to work with the New Jersey Department of Community Affairs (DCA), county and municipal leaders, and organizations in all counties to conduct outreach events to local communities.

Questions about adjournment requests and all aspects of landlord tenant case processes may be directed to Taironda E. Phoenix, Assistant Director for Civil Practice at (609) 815-2900 ext. 54900 or taironda.phoenix@njcourts.gov. Requests for information about community outreach events should be directed to Janie Rodriguez, Chief of Outreach and Litigant Services, at (609) 815-2900 ext. 52363 or Janie.rodriquez@njcourts.gov.



Glenn A. Grant, J.A.D.
Acting Administrative Director of the Courts

Dated: August 5, 2021

Exhibit B

12:31



99%



Gmail Notification

now

Original Application ID:
NJE256371

Total Amount:
[See Payments Tab...](#)

Application Date:
11/02/2021

Processed Date:
12/21/2022

Application Status:

Disbursed



Please note: If the status of your application is showing "Disbursed", please allow a minimum of 7-14 business days from the "Processed Date" above.

EPP Applicant Information

EPP Applicant ID:
EPP045817

EPP Monthly Amount:
\$800

EPP Application Date:
05/12/2022

EPP Start Date:
04/01/2022

EPP Application Status:

Active Monthly
Payments



EPP Recertification ID:

EPR111802

EPP Recertification



 njdca.onlinepha.com



12:31



99%



EPP Recertification ID:

EPR111802

EPP Recertification

Status:

Review Approved, refer to
EPP Application Status

A total of 24 months of assistance for ERA and EPP combined may be distributed based on eligibility.

Applicants should refer to notices received regarding assistance for the Emergency Rental Assistance Program and/or Eviction Prevention Program.

Programs & Status Descriptions

PROGRAMS

Original Application - NJE, NJI, NJV

Applications with the prefix: NJE, NJI, NJV. These applications are associated with the Emergency Rental Assistance (ERA) 1 funding assistance.

Recertification - RCE

Applications with the prefix: RCE. Applications for additional rental assistance after initial ERA assistance has been received.

EPP

EPP
Applications with the prefix: EPP. Ongoing
monthly stipend assistance based on Applicant's
income tier level and AMI calculations.



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12:32



99%

\$ Payments



| Payment Type | Check Date | VMS Date |
|--------------------------------|------------|------------|
| Stipend | 03/30/2023 | 03/01/2023 |
| Payee Robert Olivarez | | |
| Payment Amount \$800.00 | | |
| Stipend | 03/30/2023 | 02/01/2023 |
| Payee Robert Olivarez | | |
| Payment Amount \$800.00 | | |
| Stipend | 03/30/2023 | 01/01/2023 |
| Payee Robert Olivarez | | |
| Payment Amount \$800.00 | | |
| Arrears | 01/19/2023 | 12/21/2022 |
| Stipend | 03/30/2023 | 12/01/2022 |

Payee Robert Olivarez



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12:32



99%

| | | |
|---------|------------|------------|
| Stipend | 03/30/2023 | 12/01/2022 |
|---------|------------|------------|

Payee Robert Olivarez

Payment Amount \$800.00

| | | |
|---------|------------|------------|
| Stipend | 03/30/2023 | 11/01/2022 |
|---------|------------|------------|

Payee Robert Olivarez

Payment Amount \$800.00

| | | |
|---------|------------|------------|
| Stipend | 03/30/2023 | 10/01/2022 |
|---------|------------|------------|

Payee Robert Olivarez

Payment Amount \$800.00

—
Warmest regards,
Ivette
[Contact me \(Digital business card\)](#)
[To schedule a meeting, click here](#)

Exhibit C

< All Inboxes



★ NJ Customer... 6:41PM

To: Ivette Laia Báez >

Ticket Status: Open - 2905



Hello Ruth Ivette Baez,

We have opened your request.
The details of the resolution are
as follows:

| Request Details | |
|--------------------|------------|
| Ticket Created On: | 08-02-2023 |
| Request ID: | NJT02960 |
| Overall Status: | Open |
| Type of Issue: | Lost Check |
| Ticket Status: | Initiated |

No action required on your part at the moment.

Thank you,

NJ Department of Customer Care



Exhibit D



[Click here to learn great reasons to join eXp](#)
[The Model Explained](#)

IMPORTANT NOTICE: Never trust wiring instructions sent via email. Always independently confirm wiring instructions in person or via a telephone call to a trusted and verified phone number. Never wire money without double-checking that the wiring instructions are correct.

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information protected by law. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

Begin forwarded message:

From: noreply@mail.smapply.net

Date: August 11, 2023 at 8:32:41 PM EDT

To: r.ivettebaez@gmail.com

Subject: ERA 2 Hudson County Emergency Rental Assistance Program - Assistance Approved! / Asistencia Aprobada!

Hudson County Application Platform

Hello!

Your ERA 2 Hudson County Emergency Rental Assistance application for rental/utility assistance has been found approved for:

Total Rental Assistance Amount:

- 18800.00

Rent Apr 2020 - 0.00

Rent May 2020 - 0.00

Rent June 2020 - 0.00

Rent July 2020 - 0.00

Rent Aug 2020 - 0.00

Rent Sept 2020 - 0.00

Rent Oct 2020 - 0.00

Rent Nov 2020 - 0.00

Rent Dec 2020 - 0.00

Rent Jan 2021 - 0.00

Rent Feb 2021 - 0.00

Rent Mar 2021 - 0.00

Rent Apr 2021 - 0.00

Rent May 2021 - 0.00

Rent June 2021 - 0.00

Rent July 2021 - 0.00

Rent Aug 2021 - 0.00

Rent Sept 2021 - 0.00

Rent Oct 2021 - 0.00

Rent Nov 2021 - 0.00

Rent Dec 2021 - 0.00

Rent Jan 2022 - 0.00

Rent Feb 2022 - 0.00

Rent Mar 2022 - 0.00

Rent Apr 2022 - 0.00

Rent May 2022 - 0.00

Rent June 2022 - 0.00

Rent July 2022 - 0.00

Rent Aug 2022 - 0.00

Rent Sept 2022 - 0.00

Rent Oct 2022 - 2350.00

Rent Nov 2022 - 2350.00

Rent Dec 2022 - 2350.00

Rent Jan 2023 - 0.00

Rent Feb 2023 - 2350.00

Rent Mar 2023 - 2350.00

Rent Apr 2023 - 2350.00

Rent May 2023 - 2350.00

Rent June 2023 - 2350.00

Rent July 2023 - 0.00

Rent Aug 2023 - 0.00

Rent Sept 2023 - 0.00

Rent Oct 2023 - 0.00

Rent Nov 2023 - 0.00

Total Utility Assistance Amount:

This is the total amount of assistance that will be sent directly to your landlord and/or utility company. Please allow at least 25 business days from this date for your landlord/ utility provider to receive payment.

If you have any questions, please reach out to the social worker handling your case:

Jackie Gomez

JGomez@hcdfs.us

When reaching out to your social worker, please make sure to reference your application ID in your email.

Your Application ID is 7622817133

Lastly, if you require additional rental assistance DO NOT SUBMIT ANOTHER APPLICATION. We already have your information under the original application you submitted therefore a 2nd application is not necessary. If you submit a 2nd application to our rental program, we will not review it.

Instead, if you need more rental assistance, just email email Monica Yeng (MYeng@hcdfs.us) or Jackie Gomez (JGomez@hc.us). Please provide your application ID and explain why you require additional rental assistance. Monica Yeng and Jackie Gomez will determine whether you qualify for additional rental assistance and will provide instructions on how to request this assistance.

¡Hola!

Su solicitud ERA 2 Prevención de Desalojo del Condado de Hudson para asistencia de alquiler / servicios públicos se ha encontrado elegible por:

Asistencia de Renta:

- 18800.00

Asistencia de Luz y Gas:

Esta es la cantidad total de asistencia que se enviará directamente a su arrendador o compañía de servicios públicos.

Por favor, espere al menos 25 días a partir de esta fecha para que su arrendador / proveedor de servicios públicos reciba el pago.

Si tiene alguna pregunta, comuníquese con el trabajador social que maneja su caso:

Jackie Gomez

JGomez@hcdfs.us

Cuando se comunique con su trabajador social, asegúrese de hacer referencia a su ID de solicitud en su correo electrónico.

Su ID de aplicación es 7622817133

Por último, si necesita asistencia de renta adicional, NO ENVÍE OTRA SOLICITUD. Ya tenemos su información en la solicitud original que envió, por lo tanto, no es necesaria una segunda solicitud. Si envía una segunda solicitud a nuestro programa, no la revisaremos.

En cambio, si necesita más asistencia de renta, solo envíe un correo electrónico a Monica Yeng (MYeng@hcdfs.us) o Jackie Gomez (JGomez@hc.us). Explique por qué necesita asistencia adicional y por favor proporcione su ID de aplicación. Monica Yeng / Jackie Gomez determinará si califica para asistencia de renta adicional y le dará instrucciones sobre cómo solicitar esta asistencia.

You are receiving this email from Hudson County Application Platform - Hudson County Housing and Community Development.

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[New York, New York 10004](#)
(646) 278-0887-Telephone
(212) 480-8560-Fascimile

Exhibit E

Ch-7 23-16865-VFP Automatic Assignment - Meeting of Creditors - Chapter 7 - Ruth I Baez

From: cmecf_help_desk@njb.uscourts.gov

To: no-reply@njb.uscourts.gov

Date: Thursday, August 10, 2023 at 04:36 AM EDT

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court

District of New Jersey

Notice of Electronic Filing

The following transaction was received from Scheduled Automatic Assignment, shared account entered on 8/10/2023 at 4:35 AM EDT and filed on 8/10/2023

Case Name: Ruth I Baez

Case Number: [23-16865-VFP](#)

Document Number: [3](#)

Docket Text:

Meeting of Creditors and Notice of Appointment of Trustee Wolff, David with 341(a) meeting to be held on 9/11/2023 at 09:30 AM at Telephonic. Financial Management Course Certificate Due 11/13/2023. Last day to oppose discharge or dischargeability is 11/13/2023.

The following document(s) are associated with this transaction:

23-16865-VFP Notice will be electronically mailed to:

U.S. Trustee
USTPRegion03.NE.ECF@usdoj.gov

Jeffrey H. Ward on behalf of Debtor Ruth I Baez
esq3333@aol.com

David Wolff
dwtrustee@verizon.net, NJ50@ecfbis.com

23-16865-VFP Notice will not be electronically mailed to:

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
[Enter your name, address and telephone number]

Peter Cecinini, Esq.
1081 Avenue C
Bayonne, NJ 07002
Attorney for Cerditor Landlord
Stefan Tsvetkov
201-354-9305

In Re:
[Enter the debtor's name(s)]

Ruth I. Baez

Case No.: 23-16865-VFP
[Enter the case number]
Chapter: 7
[Enter the chapter; example: 13]
Hearing Date: 10/24/2023
[Enter the hearing date]
Judge: Vincent F. Papalia
[Enter the Judge's last name]

STATEMENT AS TO WHY NO BRIEF IS NECESSARY

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the court's consideration of this motion, as it does not involve complex issues of law.

Date: 9/19/2023
[Enter date this document is signed]

/s/ Peter Cecinini, Esq.
Signature [Of party seeking relief]

Caption in Compliance with D.N.J. LBR 9004-1(b)

[Enter your name, address and phone number]

Peter Cecinini, Esq.
1081 Avenue C
Bayonne, NJ 07002
Attorney for Cerditor Landlord
Stefan Tsvetkov
201-354-9305

In Re:

[Enter the debtor's name(s)]

Ruth I. Baez

Case No.:

23-16865-VFP

[Enter the case number]

Chapter:

7

[Enter the chapter of the case]

Hearing Date:

10/24/2023

[Enter the hearing date]

Judge:

Vincent F. Papalia

[Enter the Judge's last name]

CERTIFICATION OF SERVICE

1. I, Peter Cecinini, Esq.:

☒ represent Stefan Tsvetkov, the landlord in this matter.

☐ am the secretary/paralegal for _____, who represents
_____, the landlord in this matter.

☐ am the landlord in this case and am representing myself.

2. On 9/19/2023 *[Enter the date you served the documents]*, I sent a copy of
the following pleadings and/or documents to the parties listed in the chart below.

[Place a check next to each document you served]

☒ Notice of Motion for Relief from the Automatic Stay

☒ Certification of Landlord in Support of Motion for Relief from the Automatic Stay

☒ Statement as to Why No Brief is Necessary

☒ Proposed Order Granting Motion for Relief from the Stay

☐ Other *[Explain]* _____

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: 9/21/23

/s/ Peter Cecinini, Esq.

[Enter the date you signed this document]

Signature [Of the person who served the documents]

| Name and Address of Party Served | Relationship of Party to the Case | Mode of Service |
|---|---|---|
| [Enter the name and address of the party you served] Ruth I. Baez 4523 Harrison Pl., 2nd Floor Union City, NJ 07087 | [Enter the party's relationship to the case] Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.) |
| [Enter the name and address of the party you served] David Wolf, Esq. (Ch. 7 Trustee) 396 Route 34 Matawan, NJ 07747 | [Enter the party's relationship to the case] Ch. 7 Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.) |
| [Enter the name and address of the party you served] Jeffrey H. Ward, Esq. 2 Villege Ct., Hazlet NJ 07730 | [Enter the party's relationship to the case] Attorney For Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.) |
| [Enter the name and address of the party you served] | [Enter the party's relationship to the case] | <input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.) |

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

[Enter your name, address and phone number]

Peter Cecinini, Esq.
1081 Avenue C
Bayonne, NJ 07002
Attorney for Creditor Landlord
Stefan Tsvetkov
201-354-9305

In Re:

[Enter the debtor's name(s)]

Ruth I. Baez

Case No.: 23-16865-VFP
[Enter the case number]

Chapter: 7
[Enter the case number]

Hearing Date: 10/24/2023
[Enter the hearing date]

Judge: Vincent F. Papalia
[Enter the Judge's last name]

ORDER GRANTING MOTION FOR RELIEF FROM THE STAY

The relief set forth on the following page is **ORDERED**.

[Leave the rest of this page blank]

The Court having reviewed the movant's Motion for Relief from the Automatic Stay, and any related responses or objections, it is hereby

ORDERED that:

1. The automatic stay is vacated to permit the landlord to initiate or resume an action in the state court of New Jersey for possession of the debtor's rented premises located at:

4523 Harrison Pl, 2nd Floor, Union City, NJ 07087.

2. The landlord shall serve a copy of this order on the debtor, debtor's attorney, if any, the Office of the U. S. Trustee and any trustee appointed in this case, and any other party who entered an appearance on the motion.

3. Other: *[Enter the relief sought or ordered by the Court at the hearing. Each item of relief must be set forth in a separate numbered paragraph]* _____
